UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA CHARLESTON DIVISION

ELVIS MOODIE, RAYON FISHER,	
DESMOND ELLIS, and)
KEISHA COLLINS-ENNIS, on behalf of)
themselves and all others similarly situated,)
•) Case No. 2:15-cv-01097-RMG
Plaintiffs,)
)
V.)
)
KIAWAH ISLAND INN COMPANY, LLC,)
d/b/a KIAWAH ISLAND GOLF RESORT,)
)
Defendant.)
)

PLAINTIFFS' MOTION FOR APPROVAL OF COSTS AND ATTORNEYS' FEES ASSOCIATED WITH CLASS ACTION SETTLEMENT AGREEMENT

Pursuant to Rules 23(h) and 54(d)(2) of the Federal Rules of Civil Procedure, Local Rule 54.02, and this Court's June 14, 2016 Order, Plaintiffs hereby move the Court for approval of the \$300,000 in costs and attorneys' fees agreed to by the parties as part of their class action settlement.

The parties have submitted a joint motion for final approval of their class action settlement. The settlement agreement includes a provision that would pay Class Counsel \$300,000 to compensate them for costs and attorneys' fees. This figure is separate from the provision in the agreement to pay \$2,000,000 to a Class Settlement Fund. Plaintiffs hereby move the court for approval of the \$300,000 in costs and attorneys' fees associated with the class action settlement agreement.

This motion is supported by the accompanying memorandum and its attached declarations. Plaintiffs' counsel has consulted with counsel for the Defendant and they do not oppose this motion.

Respectfully submitted,

/s/ Nancy Bloodgood

Nancy Bloodgood (Federal Bar No. 5208)

nbloodgood@fosterfoster.com

Lucy Sanders (Federal Bar No. 10834)

lsanders@fosterfoster.com

Bloodgood & Sanders, L.L.C.

242 Mathis Ferry Road, Suite 201

Mount Pleasant, SC 29464 Telephone: (843) 972-0313

Facsimile: (843) 352-4714

Sarah M. Rich* (GA Bar No. 281985)

sarah.rich@splcenter.org

James M. Knoepp* (GA Bar No. 366241)

jim.knoepp@splcenter.org

Michelle R. Lapointe* (GA Bar No. 007080)

michelle.lapointe@splcenter.org

Southern Poverty Law Center

1989 College Ave. NE

Atlanta, GA 30317

Telephone: (404) 521-6700 Facsimile: (404) 221-5857

ATTORNEYS FOR PLAINTIFFS

^{*}Admitted pro hac vice.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this date electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification to the following attorneys for the Defendants:

Cherie W. Blackburn
Molly Hughes Cherry
Nexsen Pruet, LLC
205 King Street, Suite 400 (29401)
P.O. Box 486
Charleston, SC 29402
cblackburn@nexsentpruet.com
mcherry@nexsentpruet.com

James B. Hood Hood Law Firm, LLC 172 Meeting Street Charleston, SC 29401 james.hood@hoodlaw.com

David J. Garrett
Nexsen Pruet, LLC
4141 Parklake Avenue, Suite 200
Raleigh, NC 27612
dgarrett@nexsenpruet.com

101	Nancy	Place	lanad
/S/	Nancy	BIOOG	1900a

this 5th day of December, 2016.